

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**TRUSTEE'S MOTION TO EXTEND TIME FOR THE DEFENDANT TO FILE AN
ANSWER OR OTHERWISE RESPOND TO THE TRUSTEE'S ORIGINAL
COMPLAINT PURSUANT TO FEDERAL BANKRUPTCY RULE 7012**

TO THE HONORABLE MARVIN ISGUR, UNITED STATES BANKRUPTCY JUDGE:

Rodney D. Tow (the “Trustee” or “Plaintiff”), in his capacity as chapter 7 trustee for the chapter 7 bankruptcy estate of Koontz-Wagner Custom Control Holdings, LLC (the “Debtor”), files this Trustee’s Motion to Extend Time for the Defendant to File an Answer or Otherwise Respond to the Trustee’s Original Complaint Pursuant to Federal Bankruptcy Rule 7012, and in support thereof would show this Court as follows:

1. On July 9, 2020, the Trustee filed his Trustee’s Original Complaint (the “Complaint”) to Avoid and Recover Transfers Pursuant to 11 U.S.C. §§547 and 550, and for Other Relief against the above-captioned defendant (“Defendant”).

2. Pursuant to Federal Bankruptcy Rule 7012, the deadline for the Defendant to file an answer or otherwise respond to the Complaint is August 13, 2020.

3. The Trustee seeks an extension of that deadline for 90 days until October 12, 2020, to allow the Trustee and the Defendant time to potentially resolve the issues without either party incurring attorney's fees and costs of litigation.

WHEREFORE, the Trustee respectfully requests that the Court enter an order extending the answer deadline from August 13, 2020 until October 12, 2020, and for such other and further relief, at law and in equity, as this Court deems just.

Dated: July 17, 2020

Respectfully submitted,

BARRON & NEWBURGER, P.C.

/s/R. J. Shannon

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*Special Counsel for Rodney D. Tow, Chapter
7 Trustee for Koontz-Wagner Custom Control
Holdings LLC*

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2020, I caused a true and correct copy of the foregoing to be served on the Defendant's Registered Agent by regular first class mail at the following address:

Industrial Climate Engineering, A Division of Airxcel, Inc.
c/o The Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

/s/R. J. Shannon

R. J. Shannon

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
KOONTZ-WAGNER CUSTOM)	Case No. 18-33815
CONTROL HOLDINGS LLC,)	
Debtor.)	(Chapter 7)
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RODNEY D. TOW, CHAPTER 7)	
TRUSTEE,)	
Plaintiff,)	Adversary No. 20-03273
v.)	
INDUSTRIAL CLIMATE)	
ENGINEERING, A DIVISION OF)	
AIRXCEL, INC.,)	
Defendant.)	

**ORDER EXTENDING TIME FOR THE DEFENDANT TO FILE AN ANSWER OR
OTHERWISE RESPOND TO THE TRUSTEE'S ORIGINAL COMPLAINT PURSUANT
TO FEDERAL BANKRUPTCY RULE 7012**

Came on for consideration the Trustee's Motion to Extend Time for the Defendant to File an Answer to the Trustee's Original Complaint Pursuant to Federal Bankruptcy Rule 7012 (the "Motion"). The Court has considered the Motion and has determined that the relief sought therein should be granted. It is therefore,

ORDERED that the deadline for the above-captioned defendant to file an answer or otherwise respond to the Trustee's Original Complaint is hereby extended from August 13, 2020, until October 12, 2020.

Signed this ____ day of July, 2020.

**MARVIN ISGUR,
UNITED STATES BANKRUPTCY JUDGE**